

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JILL BLOOMBERG,

Plaintiff,

v.

AFFIDAVIT OF
LOUISE BAUSO

THE NEW YORK CITY DEPARTMENT OF
EDUCATION and CARMEN FARINA,

Defendant.
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STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

LOUISE BAUSO, being duly sworn, deposes and states as follows:

1. I am a teacher at Park Slope Collegiate ("PSC") and a resident of Kings County.
2. I have personal knowledge of the facts contained in this affidavit, which I submit in support of plaintiff Jill Bloomberg's motion for temporary restraining order and preliminary injunction
3. I am a recent addition to the faculty of PSC. I decided to make this change last June, after nine years at the same school, based primarily on my respect for Jill Bloomberg as an educator and an administrator. For this reason, I am writing this affidavit on behalf of her case.
4. Being new to the school, the OSI (now SCI) investigation is extremely disconcerting to me. At our fall retreat in September, I was struck by the solidarity and strong sense of community among the faculty. Only a few months later, I am now struck by an undercurrent of distrust and distinct allegiances.
5. In my view, there is a clear connection between this investigation and Jill's fight for racial equity. Whether it was in response to Jill's advocating on behalf of our volleyball team


following a racist incident at Brooklyn Tech High School, or her objecting to clear discrimination within the Public School Athletic League, the timing of her investigation is troubling.

6. The distrust among our faculty and the retaliatory nature of the investigation have directly impacted my choices in curriculum and organizing at Park Slope Collegiate. In early March, I coordinated a Know Your Rights presentation for parents, students, and teachers. The information presented by an immigration lawyer was in response to executive orders of the Trump administration. It was translated into Spanish and Arabic and was well-attended, even by a representative from City Council District 38. Although I was quite proud of the event, I am now more reticent about organizing on behalf of immigrants because of the current investigation and school climate.

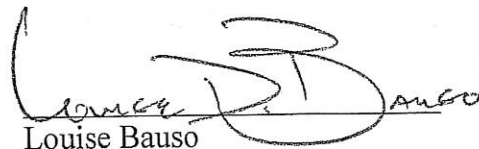
7. Another teacher at PSC has told me that he is concerned for his job security because of the investigation, as he is not tenured. This teacher offered to submit an affidavit in support of this injunction, but changed his mind and has instead opted not to participate in Jill's case.

Sworn to before me this

20 day of April, 2017.


Notary Public

MARIA CHICKEDANTZ
NOTARY PUBLIC-STATE OF NEW YORK
NO 02CH6315888
QUALIFIED IN KINGS COUNTY
MY COMMISSION EXPIRES 12-01-2018


Louise Bauso